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August 8, 2022

**Via ECF**

The Honorable Analisa Torres  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: TamarindArt, LLC v. Raisa Husain and Owais Husain as Administrators of the Estate of Maqbool Fida Husain, No. 1:22-cv-595 (S.D.N.Y.)

**JOINT DISCOVERY EXTENSION REQUEST**

Dear Judge Torres:

This firm represents Plaintiff, Tamarind Art, LLC (“Tamarind”). I write pursuant to the Court’s Individual Practices and a conversation I had with Chambers on Friday, August 5, 2022. I write jointly on behalf of all Parties to the case to request the Court reopen fact discovery. Good cause exists to reopen fact discovery for the reasons set forth below. If the Court agrees to reopen fact discovery, the parties shall file a revised proposed Civil Case Management Plan within seven (7) days of that order. In addition, the parties believe, for the reasons further set forth below, that it would still be useful to hold the Case Management Conference currently scheduled for August 16, 2022 at 10:00 a.m., either on that date and at that time or at a date and time convenient for the Court.

First, shortly after discovery commenced and the Parties exchanged written discovery answers and documents, the Parties decided—together—to delay continued discovery in favor of settlement negotiations. The Parties worked together for many weeks to come to an agreement. The Parties held multiple calls, exchanged multiple emails and corresponded regularly in an effort to resolve the case. Given the complex and long history between the Parties the negotiations were lengthy. Unfortunately, after many weeks, the Parties were unable to reach an agreement. After it became clear that we would be unable to reach agreement, the Parties both agreed to extend discovery. Given the posture of the case, the relatively short extension of discovery requested, and the Parties’ ongoing cooperation and agreement to extend/reopen discovery, good cause exists to reopen discovery.

Second, I planned on filing this joint letter before fact discovery ended on July 27, 2022. However, on July 22, 2022, I was called away with an urgent personal/family matter. I have just



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returned to the office today. Therefore, I was unable to file this letter the week of July 27, 2022. Given these circumstances, and that both sides would be prejudiced in the absence of a short discovery extension, good cause exists to reopen discovery.

The Parties believe that it would also be useful to hold the Case Management Conference in the near future, for purposes of addressing the new schedule and potential mediation. The Court's guidance would be helpful given the current posture of the case, in which the parties have come to agreement on the central merits issues but have not been able to settle.

We thank the Court for its courtesies.

Sincerely,

**OFFIT KURMAN, P.A.**

By: /s/ Lucas A. Markowitz  
Lucas Markowitz, Esq.